

**AMENDMENTS TO THE DRAWINGS:**

This Amendment encloses a replacement drawing sheet which corrects Figures 12-14 to include the legend "Prior Art." Applicants respectfully request withdrawal of this objection.

Attachments: Replacement Sheets  
Annotated Sheet Showing Changes

### **REMARKS**

Claims 1-20 are all the claims presently pending in the application. Claims 1-4 and 6 are amended to more clearly define the invention and claims 7-20 are added. Claims 1, 4, and 7 are independent.

These amendments are made only to more particularly point out the invention for the Examiner and not for narrowing the scope of the claims or for any reason related to a statutory requirement for patentability.

Applicants also note that, notwithstanding any claim amendments herein or later during prosecution, Applicants' intent is to encompass equivalents of all claim elements.

Applicants gratefully acknowledge the Examiner's indication that claims 3 and 6 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. However, Applicants respectfully submit that all of the claims are allowable.

Claims 1 and 4 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the Mack reference in view of the Sato reference. Claims 2 and 5 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the Mack reference in view of the Sato reference and in further view of the Rusinol et al. reference.

These rejections are respectfully traversed in the following discussion.

#### **I. THE CLAIMED INVENTION**

An exemplary embodiment of the claimed invention, as defined by, for example, independent claim 1, is directed to a washer pump that includes a case which is partitioned into a motor chamber and a pump chamber by a partition wall at one end of a cylindrical pump case, an armature accommodated in the motor chamber, the armature having an armature shaft rotatable when the armature is electrically energized, an impeller accommodated in the pump chamber and coupled to the armature shaft so as to be rotatable, a liquid suction port in a circumferential wall of said cylindrical pump case and communicating with the pump chamber from which washing liquid is sucked into the pump chamber by a rotation of the impeller, and a filter detachably attached in the liquid suction port for filtering the washing liquid. A ventilation hole is formed in the partition wall between the pump

chamber and the liquid suction port, so that an air passage communicating with the ventilation hole is provided in the filter.

Conventional washer pumps are not capable of pumping washer fluid if the pump chamber is full of air. The impellers of such pumps are not able to pump the air out of the pump chamber and, thus cannot pump the washer fluid.

In stark contrast, the present invention provides a washer pump with a ventilation hole in the partition wall that partitions the motor chamber from the pump chamber. In this manner, the present invention is able to pump air out of the pump chamber and, thereby, enable the pumping of washer fluid. (Page 4, lines 2-11).

## **II. THE 35 U.S.C. § 112, SECOND PARAGRAPH REJECTION**

The Examiner alleges that claims 1-6 are indefinite. While Applicants submits that such would be clear to one of ordinary skill in the art to allow them to know the metes and bounds of the invention, taking the present Application as a whole, to speed prosecution claims 1-4 and 6 have been amended in accordance with Examiner Koczo's very helpful suggestions.

In view of the foregoing, the Examiner is respectfully requested to withdraw this rejection.

## **III. THE PRIOR ART REJECTIONS**

### **A. The Mack reference in view of the Sato reference**

Regarding the rejection of claims 1 and 4, the Examiner alleges that the Sato reference would have been combined with the Mack reference to form the claimed invention. Applicants submit, however, that these references would not have been combined and, even if combined, the combination would not teach or suggest each and every element of the claimed invention.

None of the applied references teaches or suggests the features of the claimed invention including a washer pump that includes a case which is partitioned into a motor chamber and a pump chamber by a partition wall, and a ventilation hole formed in the partition wall. As explained above, this feature is important for removing air from the pump chamber and pumping washer fluid.

In stark contrast, the Mack reference discloses a pump assembly with an air bleed

passage 42 that is formed in a wall 30 which partitions the impeller chamber 26 from the liquid suction port 40. The wall 30 does not partition the impeller chamber 26 from a motor chamber.

Therefore, the Mack reference very clearly does not teach or suggest the features of the claimed invention including a washer pump that includes a case which is partitioned into a motor chamber and a pump chamber by a partition wall, and a ventilation hole formed in the partition wall.

The Sato reference does not remedy the deficiencies of the Mack reference.

The Sato reference merely discloses a pump assembly. The Sato reference does not teach or suggest any ventilation hole at all, let alone a ventilation hole that is formed in a partition wall that partitions a motor chamber from a pump chamber.

Indeed, the Examiner does not allege that the Sato reference teaches or suggests these features.

Clearly, the Sato reference does not teach or suggest the features of the claimed invention including a washer pump that includes a case which is partitioned into a motor chamber and a pump chamber by a partition wall, and a ventilation hole formed in the partition wall.

Therefore, the Examiner is respectfully requested to withdraw the rejection of claims 1 and 4.

**B. The Mack reference in view of the Sato reference and in further view of the Rusinol et al. reference**

Regarding the rejection of claims 2 and 5, the Examiner alleges that the Sato reference would have been combined with the Mack reference and further alleges that the Rusinol et al. reference would have been combined with the Sato reference and the Mack reference to form the claimed invention. Applicants submit, however, that these references would not have been combined and, even if combined, the combination would not teach or suggest each and every element of the claimed invention.

None of the applied references teaches or suggests the features of the claimed invention including a washer pump that includes a case which is partitioned into a motor chamber and a pump chamber by a partition wall, and a ventilation hole formed in the partition wall. This feature is important for removing air from the pump chamber and

pumping washer fluid.

As explained above, neither the Mack reference nor the Sato reference teaches or suggests these features.

The Rusinol et al. reference does not remedy the deficiencies of the Mack reference and the Sato reference.

Rather, the Rusinol et al. reference merely discloses a filter for a pump. The Rusinol et al. reference does not teach or suggest any ventilation hole at all, let alone a ventilation hole that is formed in a partition wall that partitions a motor chamber from a pump chamber.

Indeed, the Examiner does not allege that the Rusinol et al. reference teaches or suggests these features.

Clearly, the Rusinol et al. reference does not teach or suggest the features of the claimed invention including a washer pump that includes a case which is partitioned into a motor chamber and a pump chamber by a partition wall, and a ventilation hole formed in the partition wall.

Therefore, the Examiner is respectfully requested to withdraw the rejection of claims 2 and 5.

#### **IV. FORMAL MATTERS AND CONCLUSION**

The Office Action objects to the drawings. This Amendment encloses a replacement drawing sheet which corrects Figures 12-14 to include the legend "Prior Art." Applicants respectfully request withdrawal of this objection.

The Office Action also objects to the specification. In particular, the Office Action alleges that the specification fails to provide proper antecedent basis for the partition wall of claims 1 and 4. However, Applicants respectfully direct the Examiner's attention to the specification at, for example, page 10, line 18, which very clearly provides proper antecedent basis for the partition wall.

In view of the foregoing amendments and remarks, Applicants respectfully submit that claims 1-20, all the claims presently pending in the Application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the Application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed

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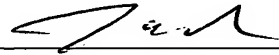
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below to discuss any other changes deemed necessary in a telephonic or personal interview.

The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Attorney's Deposit Account No. 50-0481.

Respectfully Submitted,

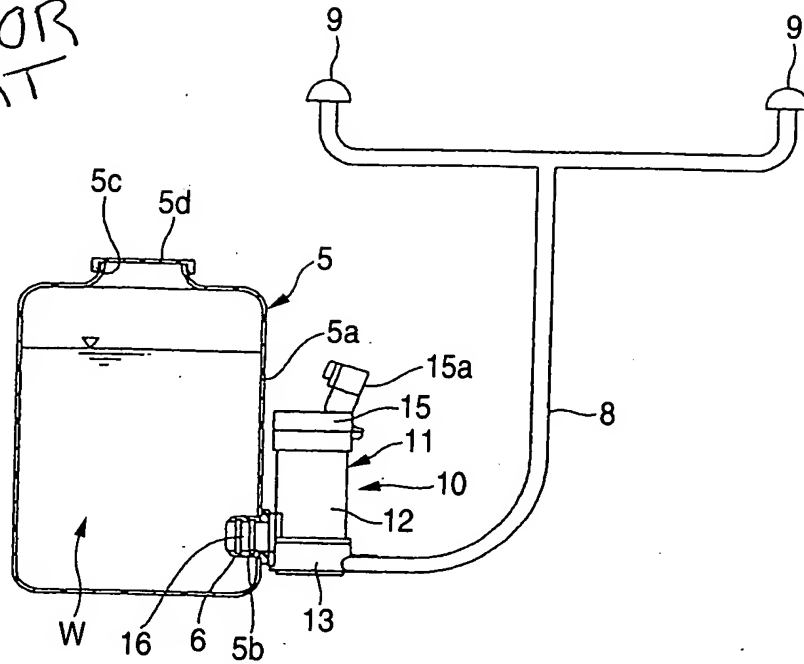
Date: 2/20/07

  
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**FIG. 12**  
PRIOR ART



**FIG. 13**  
PRIOR ART

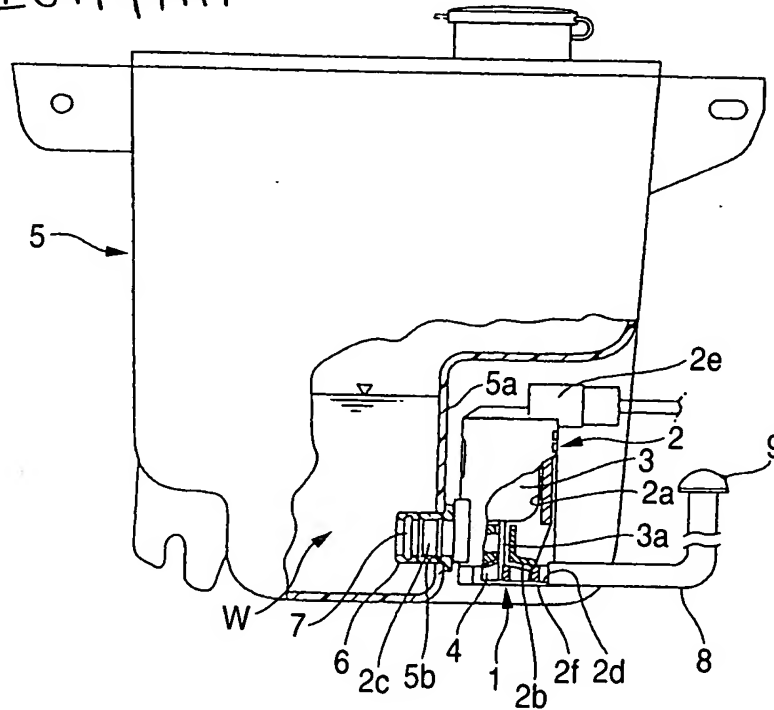


FIG. 14 PRIOR ART

